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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

United States of America,

Plaintiff,

vs.

Abdul Malik Abdul Kareem,

Defendant.

No. 2:15-cr-00707-SRB

**NOTICE OF SUPPLMENTAL
AUTHORITY**

The defendant, Abdul Malik Abdul Kareem, by and through his counsel, hereby provides this Honorable Court with supplemental authority regarding *Brady* disclosure obligations, providing additional grounds supporting his Motion to Compel *Brady* Disclosure and its Reply, Docs. 778 and 797.

In *United States v. Blanco*, 392 F.3d 382 (9th Cir. 2004), much of the cooperator's testimony had not been witnessed by agents nor recorded. Evidence that could impeach his *ipse dixit* was therefore material. The defense had been unsuccessful in securing the cooperator's impeachment evidence except for money payments. The government (as here) answered broad *Brady* cooperator demands with only select responses, and siloed its *Brady* review to the DEA rather than other involved agencies such as INS, thereby persisting in withholding full disclosure of the charges he avoided and the immigrations

1 visa he got. Finally, the defense had to demand all contacts between the cooperator and
2 the agents to ensure the extent of the benefits. This relates to the instant demands for
3 greater evidence as to Ali Soofi and Stefan Verdugo.
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5 **CERTIFICATE OF SERVICE**

6 I hereby certify that on February 18, 2024, I electronically transmitted the attached
7 document to the Clerk's Office of the District Court in Phoenix, Arizona using the
8 CM/ECF system for filing, and the following registered participants will thus be served
9 by the CM/ECF system. I further certify that on this day I placed a printed copy of this
10 motion in the U.S. Mails to go to Mr. Abdul Kareem at FCI Otisville.
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12 Respectfully submitted on February 18, 2024.

13 DONNA LEE ELM

14 /s/ Donna Lee Elm
15 Donna Lee Elm
16 Counsel for Defendant Abdul Kareem
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